

Hearing Date: July 30, 2015
Opposition Deadline: June 30, 2015
Reply Deadline: July 16, 2015

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

RESIDENTIAL CAPITAL, LLC, *et al.*,

Debtors.

Chapter 11

Case No. 12-12020 (MG)

(Jointly Administered)

**NOTICE OF DEFENDANTS' MOTION
TO MODIFY ORDER APPOINTING
MEDIATOR**

PLEASE TAKE NOTICE that, upon Defendants' Motion to Modify Order Appointing Mediator filed on June 3, 2015 in *In Re Rescap Liquidating Trust Mortgage Purchase Litigation*, Adv. Proc. No. 14-07900, (MG) (the "Adversary Proceeding") (Dkt. 85); the Memorandum of Law In Support of Defendants' Motion to Modify Order Appointing Mediator (Dkt. 86); and the Declaration of Krista Anderson and exhibits attached thereto (Dkt. 87),¹ each of the defendants (collectively, the "Defendants") in the Adversary Proceeding, by and through their undersigned counsel, will move this Court on July 30, 2015, before the Honorable Martin Glenn, United States Bankruptcy Judge, at the United States Bankruptcy Court, One Bowling Green, New York, New York 10004, for an Order modifying the Order Appointing Mediator to permit Defendants to take discovery of the mediation communications between the adverse Chapter 11 parties regarding the Global Settlement.

Dated: June 12, 2015

Respectfully submitted,

¹ A copy of the docketed motion and supporting papers may be obtained at <https://ecf.nysb.uscourts.gov/cgi-bin/DktRpt.pl?251286>.

/s/ R. Hackney Wiegmann

R. Hackney Wiegmann (hwiegmann@wc.com)
Andrew W. Rudge (arudge@wc.com)
Matthew V. Johnson (mjohnson@wc.com)
Jesse Smallwood (jsmallwood@wc.com)
Krista Anderson (kmanderson@wc.com)
WILLIAMS & CONNOLLY LLP
725 Twelfth Street, N.W.
Washington, DC 20005
(202) 434-5000
(202) 434-5029 (fax)

Attorneys for Defendant HSBC Mortgage Corp. (USA)

/s/ John Doherty

John P. Doherty (john.doherty@alston.com)
Jennifer Susan Kozar
(jennifer.kozar@alston.com)
James S. D'Ambra, Jr.
(jamesdambra@alston.com)
ALSTON & BIRD LLP
90 Park Avenue
New York, NY 10016
(212) 210-9400
(212) 210-9444 (fax)

/s/ Cameron S. Matheson

James A. Murphy (jmurphy@mmlawus.com)
Cameron S. Matheson (cmatheson@mmlawus.com)
Theodore R. Snyder (tsnyder@mmlawus.com)
MURPHY & MCGONIGLE, PC
1185 Avenue of the Americas
21st Floor
New York, NY 10036
(212) 880-9999

Attorneys for Defendants Summit Financial Mortgage LLC and Summit Community Bank, Inc.

/s/ Roland P. Reynolds

Roland P. Reynolds
(rreynolds@pldlawyers.com)
PALMER, LOMBARDI & DONOHUE, LLP
515 South Flower Street
Suite 2100
Los Angeles, CA 90071
(213) 688-0430
(213) 688-0440 (fax)

Attorney for Defendant Mortgage Investors Group, a general partnership

/s/ Robert A. Fumerton

Robert A. Fumerton (robert.fumerton@skadden.com)
Alexander C. Drylewski
(alexander.drylewski@skadden.com)
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
Four Times Square
New York, NY 10036
(212) 735-3000
(212) 735-2000 (fax)

Attorneys for Defendant UBS Real Estate Securities Inc.